



Federal Communications Commission

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Cover Sheet

1. **Proceeding** (required)

99-328

2. **Mail Correspondence To:** (required) ☐ Name ☐ Law Firm ☒ Attorney

3. **Name of Applicant/Petitioner** (required)

NENA

4. **Law Firm Name** (optional)

Law Office of James R. Hobson

5. **Attorney Name** (optional)

James R. Hobson

6. **Email-id** (optional)

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Alexandria

9. **State** (required)

VA: VIRGINIA

10. **Zip Code** (required)

22304 - 1840

11. **Ex-Parte/Late Filed**

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COMMENT

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4/10/00

James R. Hobson

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conveniences are hands-free audio, automatic muting of the car radio, radio tuning, display of cellular phone numbers and security locking of the car phone. (Request, 2) According to Motorola:

The handset, when operated without integration with the Telematics system, complies with the Commission's requirements. However, when the handset was tested with the Telematics system built into the electronics of the car, numerous system malfunctions occurred. For example, functions such as the hands-free audio capabilities of the in-car system system and automatic muting of the radio no longer worked properly.

Motorola expects that by the time the integrated system could be "debugged," the deadline would have arrived for a new car model year in which digital systems are to replace analog Telematics. Thus, the manufacturer wants to be permitted to make 30,000 non-compliant phones in the next several months.

NENA's Opposition. NENA appreciates that, in approaching the new requirements of Section 22.921, Motorola and other manufacturers have worked diligently to adapt to multimode phones rollover techniques that were developed initially for analog devices. We cannot, however, support a waiver request that would trade the enhanced call completion methods – which improve the chance of reaching a Public Safety Answering Point ("PSAP") when a preferred carrier cannot deliver – for "safety features" of seemingly secondary value.

Turning the car radio down or off before making a cellular call seems a simple enough task which most of us perform without thought every day. While hands-free audio is certainly desirable, it is not mandatory or essential for the operation of the phone. Motorola did not mention interference with the other named concierge services, but they clearly must be subordinated to the objectives of the enhanced call completion rule. In short, the solution should

be to disable the secondary Telematics services rather than to eliminate the call completion enhancement in these car phones.

NENA does not object to the non-compliance of phones that are designed for the singular purpose of reaching third-party call centers at the touch of an emergency button. However, the Telematics phones described by Motorola, which are built to reach any number on the PSTN, should be held to compliance with Section 22.921. The same compliance should be expected for any other Telematics-type phone once its capability extends beyond the singular purpose of connection to a third-party call center.

Since the Motorola phones are compliant when not integrated with the in-vehicle concierge system described, they can be used apart from that system.

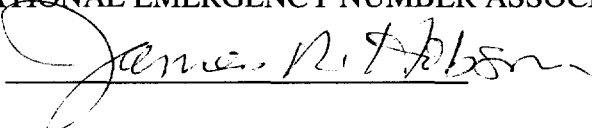
CONCLUSION

For the reasons discussed above, NENA asks that the waiver be denied.

Respectfully submitted,

NATIONAL EMERGENCY NUMBER ASSOCIATION

By


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April 10, 2000

ITS ATTORNEYS

Certificate of Service

I certify that a copy of the foregoing Comments of NENA was mailed today, U.S. Postal Service, postage prepaid, to:

Mary E. Brooner
Motorola
1350 Eye Street N.W.
Washington, D.C. 20005

Signed: James R. Hobson
James R. Hobson
Date: 4/10/00